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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**

**UNITED STATES OF AMERICA**

**3:16-CR-00051-BR**

v.

**AMMON BUNDY, et al.,**

**Defendants.**

**AFFIDAVIT OF FBI SPECIAL AGENT  
RONNIE WALKER IN SUPPORT OF  
GOVERNMENT'S SUPPLEMENTAL  
MEMORANDUM**

STATE OF OREGON )  
 ) ss.  
County of Multnomah )

1. I, Ronnie Walker, being first duly sworn, hereby depose and state as follows:

**I. INTRODUCTION AND AGENT BACKGROUND**

2. I make this affidavit in support of the government's supplemental memorandum in support of its motion to enforce the Protective Order.

3. I am a Special Agent with the Federal Bureau of Investigation and have been since 1996. My training and experience includes agency specific training in all aspects of conducting federal criminal investigations. I am an "investigative or law enforcement officer of the United States" within the meaning of Title 18, United States Code, Section 2510(7), authorized to conduct investigations into alleged violations of federal law. Over the course of my career, I have led or participated in numerous federal criminal investigations. I am currently assigned to the Portland Division of the FBI and have been assigned to assist with the investigation surrounding the January 2016 occupation of the Malheur National Wildlife Refuge (MNWR), a federal wildlife refuge operated by the United States Fish and Wildlife located south of Burns, Oregon.

4. This affidavit is intended to show only facts pertinent for the requested motion and does not set forth all of my knowledge about this matter.

## II. RELEVANT FACTS

5. On January 2, 2016, and continuing through February 11, 2016, several individuals to include Dylan ANDERSON, Sandra ANDERSON, Sean ANDERSON, Jeff Wayne BANTA, Jason BLOMGREN, Ammon BUNDY, Ryan BUNDY, Brian CAVALIER, Blaine COOPER, Shawna COX, Travis COX, Duane Leo EHMER, Eric Lee FLORES, David Lee FRY, Wesley KJAR, Corey LEQUIEU, Kenneth MEDENBACH, Joseph O'SHAUGHNESSY, Jason PATRICK, Ryan PAYNE, Jon RITZHEIMER, Jake RYAN, Pete SANTILLI, Geoffrey STANEK, Darryl William THORN, Neil WAMPLER, and others participated in the illegal occupation of the MNWR.

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6. As a result of the occupation, all of the above-named individuals were charged with conspiracy to impede by force, intimidation, or threat, officers of the United States from discharging their duties in violation of Title 18, United States Code, Section 372. Some of the above-named individuals were also charged with possessing a firearm and dangerous weapon in a federal facility in violation of Title 18, United States Code, Section 930(b); theft of government property in violation of Title 18, United States Code, Section 641; and/or depredation of government property in violation of Title 18, United States Code, Section 1361. Charges against Pete SANTILLI were subsequently dismissed. *United States v. Ammon Bundy, et al.*, was assigned case number 3:16-CR-00051-BR.

7. On February 25, 2016, the Honorable Anna J. Brown, United States District Judge, District of Oregon, ordered the government to provide discovery to the defendants. The first volume of discovery materials was provided to defense counsel on March 4, 2016. Fifty total volumes of discovery materials were provided from March 4, 2016, to October 13, 2016.

8. On March 9, 2016, Judge Brown entered an Interim Protective Order, court record 288, which stated that defense counsel may provide copies of discovery only to individuals further described in the order.

9. On March 24, 2016, Judge Brown entered the final Protective Order, court record 342, which stated defense counsel may provide copies of discovery only to: 1) the defendants in this case; 2) persons employed by the attorney of record who are necessary to assist counsel of record in preparation for trial or other proceedings in this case; and 3) persons who defense counsel deems necessary to further legitimate investigations and preparations of this case.

10. The Protective Order further ordered that defense counsel shall provide a copy of the Protective Order to any person who receives copies of discovery and that any person who receives copies of discovery from defense counsel shall use the discovery only to assist the defense in the investigation and preparation of this case and shall not reproduce or disseminate the discovery material to any other person or entity. The Protective Order applied only to 1) statements by witnesses and defendants to government officials, 2) sealed documents, and 3) evidence received from searches of electronic media.

11. Every document provided to defense counsel in discovery was marked in the lower left hand column "Dissemination Limited by Court Order."

12. On September 7, 2016, trial began for seven of the above-named defendants. The trial concluded on October 27, 2016, and all seven defendants were acquitted of the charged conspiracy. Prior to the first trial, eleven defendants pled guilty. A second trial for the remaining seven defendants is scheduled to begin February 14, 2017.

13. Beginning November 15, 2016, Gary HUNT began publishing excerpts from the discovery materials on the Outpost of Freedom blog at <http://outpost-of-freedom.com>.

14. On January 5, 2017, HUNT was served a cease and desist letter which directed him to stop publishing excerpts from the above-described discovery materials that were in his possession and in violation of the Protective Order.

15. On January 5, 2017, Sarah Redd-Buck posted a message on her Facebook page which stated "Gary Hunt just received a visit today from FBI serving him a cease and desist letter because he was publishing factual discovery that has been leaked to him that is still under seal."

On January 6, 2017, another individual posted a question on that same page asking "Who is Gary Hunt?" That same day, the message "He is working with our lawyers" was posted in reply from defendant Duane EHMER's Facebook account. Sarah Redd-Buck and Duane EHMER's Facebook accounts are not private and can be viewed by anyone accessing Facebook.

16. A copy of the above-mentioned messages has been attached to this affidavit.



Ronnie Walker  
Special Agent  
Federal Bureau of Investigation

SUBSCRIBED and SWORN to before me this 10<sup>th</sup> day of January 2017.



Notary Public for Oregon

